

## THE EVOLUTION OF THE LEAST RESTRICTIVE ENVIRONMENT CONCEPT IN LAW

The least restrictive environment concept evolved in the courts in the interplay between judges and lawyers. Educators were not directly involved. The principle arose out of the due process clause of the Fourteenth Amendment to the United States Constitution, which mandates equal protection of the laws for all citizens. This concept has been applied to numerous non-educational settings; indeed, its extensive use as an argument to alter educational practice dates only from the early 1950s. Furthermore, much of its early use in education did not involve the assurance of services or other aspects of special education but instead was used to assure equal access to public education — that is, racial integration. Yet as Chiba and Semmel (1977) point out, handicapped children were often excluded from public schools without any hearings before the educational authorities regarding placement. The precedents established through the doctrines of due process and the least restrictive alternative in the decade of the 1960s emerged as the pillars upon which much of the litigation in special education was based. This litigation ultimately resulted in the incorporation of due process and least restrictive alternative provisions for special education in both state and federal laws, the culmination of which was Public Law 94-142, a law that now greatly affects both regular and special education throughout the country.

A number of cases exemplify the positions that were presented. In the case of *Brown v. Board of Education* (1954), the Supreme Court established the principle that all children must be guaranteed equal educational opportunity and that schoolchildren may not be segregated and educated by race. The court stated: "In these days, it is doubtful that any child may reasonably be expected to succeed in life if he is denied the opportunity of an education. Such an opportunity . . . is a right which must be made available to all on equal terms." Other suits, such as *Pennsylvania Association for Retarded Children (PARC) v. Commonwealth of Pennsylvania* (1971) and *Mills v. Board of Education of the District of Columbia* (1972) extended the principles of *Brown v. Board of Education* and the implementation of due process and equal protection to the mentally retarded and all handicapped children. In these proceedings, the court established the principle that given two or more alternative educational settings, the handicapped child should be placed in the most normal setting appropriate and that there should be as little interference with the normal educational process as possible.

This was most dramatically articulated in *PARC*. In the *PARC* case, the courts ruled that

It is the commonwealth's obligation to place each mentally retarded child in a free, public program of education and training appropriate to the child's capacity, within the context of the general educational policy that, among the alternative programs of education and training required by statute to be available, placement in a regular public school class is preferable to placement in a special public school class and placement in a special public school class is preferable to placement in any other type of program of education and training. (334 F. Supp. at 1260)

Both the *PARC* and the *Mills* cases required access to schooling and established procedural due process intended, inter alia, to encourage placement in the "preferred" or most "normalized" settings and to discourage placement in the most "stigmatizing" settings (348 F. Supp. 866 [D.D.C. 1972] ).

Other law suits as well laid the foundation for Public Law 94-142. They include *Wyatt v. Stickney*, the Partlow case (1972), which concerned the care and habilitation provided to mentally retarded people living at Partlow State School and Hospital in Alabama. In this case, the court mandated that when the state interferes with a person's liberty, it must do so in the least restrictive manner. The court held that residents have a right to

the least restrictive conditions necessary to achieve . . . habilitation. No person shall be admitted to the institution unless a prior determination shall have been made that residence in the institution is the least restrictive habilitation setting feasible for that person and no mentally retarded persons shall be admitted to the institution if services and programs in the community can afford adequate habilitation to such persons. (344 F. Supp. at 396)

Similarly, in *New York State Association for Retarded Children (NYSARC) v. Carey*, the Willowbrook case (1975), the court reaffirmed that less restrictive settings were to be made available for Willowbrook's mentally retarded residents and ordered the creation of sufficient services in the community to reduce Willowbrook's overcrowded conditions. Gilhool and Stutmen (1978) have suggested that both cases illustrate the least restrictive alternative as a principle that demands that handicapped individuals must be placed in the least restrictive setting required and appropriate for the individual's needs, not merely the least restrictive setting currently available. In regard to the *Willowbrook* case, the courts ruled that services were to be provided to Willowbrook residents in the "least restrictive setting possible" and that "possible" meant possible from the perspective of the individual's needs and not from the perspective of the service system (E.D. N.Y. 1975).

The California cases of *Diana* (1970) and *Larry P.* (1971) were addressed to the concern that many poor children from minority racial and

cultural groups were inappropriately placed in segregated classes for mentally retarded children. These suits led to a revision of California law that mandated ".....children of any ethnic, socio-economic, and cultural group not be placed in classes in special programs for the educably mentally retarded if they could be served in regular classes" (Chiba and Semmel, 1977). Though perhaps less dramatic than either *Wyatt v. Stickney* or *NYSARC v. Carey*, these cases too have had considerable impact in determining what might be meant by the least restrictive alternative. Moreover, *Diana and Larry P.*, among other cases, apply the principle not only to institutional situations but also to public school services for the handicapped. Thus a concept has emerged with implications that clearly extend through the entire special education service delivery system.

The concept of the least restrictive alternative has been widely promoted and broadly defined. Generally, it connotes an acceleration of personal freedom of choice and an increase in the number of options that individuals may select from. These views have been echoed by Chambers (1974):

The principle of the least restrictive alternative derives from the apple-pie premise that people should be free to live as they please unless they are harming others. From this premise, the principle declares that when government does have a legitimate goal to serve, it should act through means that curtail individual freedom to no greater extent than is essential for serving the goal. (p. 993)

A summary, then, of the assumptions behind the legal framework might include:

1. Education and treatment are necessary, for failure to provide adequate services represents an ultimately restricted life option.
2. Education and treatment must be based upon some goals; it is implied that these goals must be compatible with the structure of the individual's society.
3. Constitutional guarantees must be assured (such as informed consent).
4. Government (implicitly, schools) cannot selectively neglect to provide education and treatment, but in providing services, government must not curtail individual freedom through excessively restrictive treatment. That is, treatment must be conducted in as normative a setting as possible, and the treatment must meet the individual's needs.

Given these assumptions, several general guidelines can be deduced:

1. All handicapped children have the right to an education in the least restrictive environment possible for them. This applies equally to public institutions and public schools.
2. Placement in a less restrictive environment cannot be denied simply

because the option does not exist in a specific state or local educational agency. If an option does not exist but is considered necessary and appropriate for a given handicapped child, there exists legal precedent to mandate the establishment and the funding of the appropriate placement.

3. The least restrictive environment mandates a continuum of services.
4. The implementation of the principle of the least restrictive environment is a responsibility of the individual state and local educational agency.

Yet, what is not readily deducible from the legal perspective is how these principles may be adequately applied, that is, the precise criteria by which the correct implementation of these guidelines can be achieved. Indeed, taken at face value, the implementation of these guidelines could provide effects that are the antithesis of the necessary provisions that the courts sought to assure. Indeed, the courts have historically maintained that issues of professional consideration — that is, determination of the best treatment stance — are to be decided by the professionals and clients involved, so long as treatment does not violate rights assured by constitutional law. Thus, determination of the more specific aspects of the least restrictive alternative must spring from the professional service provider, in large part, the special educator (and now including as well the regular educator). In order to understand that perspective, it will be necessary to briefly review the historic responses of special education that are relevant to this issue.

## **HISTORICAL ANTECEDENTS TO THE LEAST RESTRICTIVE ALTERNATIVE**

### ***The Beginnings of Special Education***

Though much has been written to document the origins of special education, two conclusions are usually adhered to. First, the handicapped have always been identified with their specific society's priorities, and consequently, reactions to them have varied enormously over time. Second, the direct origins of what might be termed contemporary special education stem from the pioneering practice of certain physicians in nineteenth-century Europe. If a single individual among these physicians could be credited with initiating "modern" special education, that person would be Jean Marc Gaspard Itard (1775-1838). Itard's work with Victor, the "Wild Boy of Aveyron," is highly significant because (1) it neatly demarcated the beginning of special education, and (2) through a near extension of Itard's personality, it established the principles that special education should possess humanistic, scientific, and pedagogical

dimensions and that it would sometimes be, euphemistically, a concern to the greater society. Thus, even from its very beginnings, special education combined social, ethical, and political factors with scientific and pedagogical orientations.

Beyond Itard, the historical chain of contributors and their contributions is complex. Although the field remained uniquely intact in some ways — for example, Itard's instructional procedures are still adjudged as among the best in special education (Gaynor, 1973) — the eventual evolution of this specialized practice resulted in considerable refinement, for example, the differentiation of handicapping conditions. As might be assumed, the social zeitgeist provided considerable orientation for the specialty's predominant operations. In their recent analysis, Kirk and Gallagher (1979) have pointed out this fact, illustrating the general obligation of the various historical periods towards handicapped individuals. The responses typical of these periods include the gross neglect characteristic of the pre-Christian era, the protection or pity of the Middle Ages, the institutional treatment of the eighteenth and nineteenth centuries, and the movement toward social integration in the latter half of the current century.

It should be noted that while these general trends are undisputed, considerable variation has existed within each. As examples, specific disabilities, age, cultural backgrounds, geographical location, and political impetus have all contributed to dissimilar treatment schemas in the same chronological era. These considerations equate, in the contemporary society, to concerns stemming from ethical views, legal views, and behavioral (scientific) views. While conflicts among these orientations are not desirable (though they are, as we have seen, predictable), the execution of approaches stemming from each may have produced some discord in answering a single question: How best to equitably serve both the handicapped and the nonhandicapped members of society? The effect of these views and their implications has been recently magnified as an informal consortium of parents, professionals, and others has brought greater awareness of the effects of handicaps into the public realm. Accordingly, a number of previously troubling issues have become matters of intense and immediate concern as various factors became apparent. A few of these factors can be related here.

First, and perhaps foremost, is the fact that at least 10 percent of school-aged children require some sort of special services. Though estimates vary, it is clear that quite a sizable proportion of children and youth require such services, a proportion sufficiently large that few service systems can function without some knowledge of the needs of this population.

Secondly, contemporary special education services are typified by an awareness of their impact across social systems as well as service systems. In the not-too-distant past, special education was nearly a disciplinary-specific response, whereas special education is now a multi-disciplinary response which serves a diverse group of handicapped children and youth in public education. The trend is not yet complete, however, as special education begins to view itself as a social system response, with special educators becoming more aware of and assuming a greater responsibility for a social as well as a professional response. This trend has been accelerated by lawsuits that have broken special education out of its limited and somewhat narrowly defined role. As we have seen, recent suits have demanded access to services and informed consent prior to services and have greatly altered the quality and quantity of services. At the very least, these suits may be seen as an extension of the greater society into the workings of a technical specialty. At most, they may be seen as a call to change and model the profession along the lines of the greater society. As a result, practices that were almost unquestioned two decades ago are now often challenged.

Finally, there are the technical innovations within the profession. Tarver (1977) has suggested that technical changes in the field have appeared most prominently in the methodology of instruction, diagnosis and evaluation techniques, research efforts, and changes in programs and services. Each of these is uniquely important, for their collective contributions have increased the field's ability to produce behavioral change and thus increase the adaptability of the handicapped to society.

Yet, the awareness that so many children and youth are handicapped, the view that special education is a social as well as service system, and that major technical innovations are possible and in fact are here, has resulted in a major concern about the procedures utilized in special education instruction. Although a number of procedures have been challenged, the manner of the provision of special programs within the school has probably received the most intense scrutiny. Much of the concern about programs and services stems from the unique environments within which special children or adults are often housed. Thus, special educators have, within the past decade, consistently cited mainstreaming (Dailey, 1974) and the least restrictive alternative (Aiello, 1976) as among the more pressing issues for special education. Both concerns may be seen as reactions to a history of predominantly segregated service structures within which quite atypical social and instructional environments were developed. Although institutions have been in operation since the earliest stages of this country's history (Rothman, 1971), special classes date from about 1890. Still, this service unit has been a

major factor in bringing mainstreaming and the least restrictive alternative to the forefront of the special educator's concern. Accordingly, a review of the challenge to the efficacy of special classes is in order.

### *Special Classes in Public Education*

The first recorded use of special classes — that is, self-contained units within public schools devoted solely to handicapped children — was in Cleveland, Ohio, in 1875. By 1890, many of the major cities in the United States had adapted this approach to teaching the handicapped (Sabatino, 1979). Over time, these classes began to expand and in so doing came to serve both more children and more diversified handicaps. In the years following World War II, the number of classes expanded and continued to grow into the early 1960s. The explosion of interest in serving the handicapped that followed in the wake of the Kennedy administration carried with it the first challenges to the special classes.

Although Dunn's (1968) article attacking the justification for self-contained special education classes for the mildly retarded has often been cited as the major thrust for the reevaluation of special classes, at least two other critical reports had appeared somewhat earlier. Johnson (1961; 1962) had been very critical of the effects of special classes on the subsequent performance of the mildly retarded. In his review of the literature to that time, he suggested that while causing little social harm, such classes actually accomplish little academically. Following on the heels of Johnson's remarks were those of Reynolds (1962). Although Reynolds did not openly discuss the research concerning placement, his remarks might be seen as a response to Johnson in that he proposed a continuum of services ranging from very little special assistance to complete institutional care. This continuum reflected a series of increasingly specialized services to be used as necessary and to be omitted as soon as possible. In essence, Reynolds proposed that highly specialized services should be utilized only on specific occasions and that suitable matches between a child's needs and proposed services could and should be both implemented and altered to suit individual needs.

These papers produced a flurry of activity as researchers began to evaluate special classes. While the many studies cannot be reviewed here, salient aspects of the research can be reported. First, at the time of Dunn's article, it appeared that a sizable proportion of children were erroneously placed in special classes and that existing criteria for placement were inadequate. This point of view has recently been weakened by new evidence (MacMillan & Becker, 1977; Meyers, MacMillan & Yoshida, 1978) which suggests that the degree of error was not so great as had been popularly thought (see, for example, Ross, DeYoung & Cohen, 1971).

Second, at least through the early 1960s, special education tended to be an all-or-nothing concern. With only a few available options, in the effort to provide some specialized services, children whose needs did not dictate a total program were in fact overprogrammed for. Ironically, at the same time, many children in need of services received little or none because of the hesitancy to provide self-contained special classes for them.

Third, a great many of the early papers that discussed the efficacy of special classes were far more philosophical-rational polemics than empirical research. These papers arose from a bandwagon effect based far more on sociopolitical concerns than on educational concerns. Challenges to special classes coincided with the civil rights movement and what Featherstone (1979), speaking of the unique tenor of the times, has termed "The sixties." In retrospect, it would appear that considerable emotional fervor accompanied the early criticism of special classes, some of it far more social-political than scientific-pedagogical, and in the end, perhaps less humanistic.

Fourth, the earliest research suffered at least two inadequacies that made its result questionable: much of the research lacked adequate designs (Keogh & Levitt, 1976; MacMillan & Becker, 1977), and most of the data were collected on educable mentally retarded children. While the latter approach may or may not have been flawed (research and programs for this exceptionality have, however, virtually disappeared [Zigler, 1979] ), generalizations to other populations may certainly have contained error, as data drawn from this group was consistently applied in more general arguments against special classes.

Fifth, in past practice, there has been a general failure to differentiate between what Schworm (1976) has termed "models" and "modes" of instruction. Special classes have largely meant only groupings of children according to what some would say are unstable and perhaps erroneous criteria. Placement settings did not address other, perhaps more relevant, learning characteristics, nor did it address unique aspects of instruction (modes). In short, little allowance was made for variance within special classes.

Finally, a problem that continues to plague researchers is that of criteria of success — that is, are educational skills sufficient evaluative criteria? Recent evidence (Budoff & Gottlieb, 1976) suggests that the variables to be considered are both numerous and complex. Moreover, the perplexing effects of special classes may accelerate some desirable gains and simultaneously slow others. Clearly, a comprehensive empirical evaluation of the effects of such classes seems to be in order.

In sum, nearly twenty years' effort has produced evidence that suggests that the matter is not simple nor will it respond to idealistic or unitary bromides. Actual data for the elimination or continuation of



special classes is limited and generally inconclusive. Indeed, of the ten potential benefits of the movement away from the special classes enumerated by Kaufman, Gottlieb, Agard, and Kukic (1975), none has been fully examined, and those that have been evaluated have generally not shown the benefits promoted in the early mainstreaming movement. With this target in mind, an analysis of mainstreaming and the least restrictive alternative, the principles epitomizing the movement from special classes, is in order.

### *MAINSTREAMING AND THE LEAST RESTRICTIVE ALTERNATIVE: THE SAME OR DIFFERENT?*

Discussion of the least restrictive alternative inevitably leads to the concept of normalization. Normalization represents the philosophical argument that handicapped individuals should be allowed to live in an environment as close to the normal as possible. Nirje (1969) has described normalization as

. . . making available to the mentally retarded patterns and conditions of everyday life which are as close as possible to the norms and patterns of the mainstream of society (p. 181)

Several components inherent in this position are worth noting. First, the position seems to emphasize intrinsic differences between the mentally retarded and nonhandicapped individuals. Thus, to extend this concept to other handicapping conditions, intrinsic differences would also have to be assumed. Second, there is the assumption that living as close to the normal as possible is a desirable goal for all people. Third, and finally, living as close to the normal as possible is presumably the goal for all aspects of life — home life, school, and religious and leisure activities. By extrapolation, these components have extended into the concept of the least restrictive alternative.

Actually, some criticism of these views has appeared. Among others, Laing (1967) has described what appears to be a need for individual uniqueness and the acceptance of that uniqueness within societies. At least in Laing's view, there is little need for all people to live as close to a norm as possible. In fact, Laing suggests that there is no norm or that, perhaps if there is, it is a corrupted norm.

Throne (1975) has described the fallacy of reliance on a developmental model. From Throne's position, it is clear that very special environments must be constructed if handicapped persons are to acquire higher rates of development, or skill competency. To do otherwise, to retain the handicapped in settings in which their development has less chance of being accelerated, virtually assures a continued estrangement if

the normative goal is accepted. Throne phrased the plight of the handicapped in such a situation as "stabilized" — that is, progression relative to the norm is not normalized but is instead delayed. Careful not to confuse the end goal of normal existence, Throne (1975) pointed out the paradox of normalization proponents who stress the use of "controlling certain physical, psychological and social aspects of the environment" (NARC, 1972, p. 5) yet argue that this can best be achieved in the normalized settings that originally defined the deviancy.

Despite these comments, normalization remains a major philosophical orientation in the delivery of service to handicapped individuals. Indeed, the principle has been extended beyond the original recipients (services to the mentally retarded) into most service areas for the less handicapped. Thus, the normalization concept seems to be the underlying principle for two concepts: the least restrictive alternative and mainstreaming.

So far, we have seen that the least restrictive alternative has no commonly accepted definition, a fact reflected in Aiello's (1976) call for a working definition. Mainstreaming may have fared little better, although it has received more attention and far more attempts at definition. Thus, while common threads run through existing descriptions<sup>1</sup>, there is not yet a fully accepted definition of either. This opinion is not new. For example, MacMillan and Becker (1978) have considered mainstreaming as a response to the political and social sentiment of "America during recent years" (1978, p. 209) and have pointedly questioned the outcome of the process as it has been implemented, suggesting that few clear-cut definitions are found in the literature. They point out that at various times, "deinstitutionalization," "delabelling," and "integration" have been used to describe the mainstreaming process. More importantly for this paper:

Ongoing attempts to define the relationship between mainstreaming, least restrictive alternative and appropriate educational placement have yet to clarify how the term translates into educational practice. (p. 210)

Largely accepting the definition of Kaufman et. al. (1975), they add that mainstreaming must also result in efforts to remove handicapping labels. However, as might be anticipated, they contend that few programs can yet meet these rigid requirements for mainstreaming.

From these discussions of mainstreaming and the least restrictive alternative, several points can be gleaned. First, the concept of mainstreaming (and, by extrapolation, of the least restrictive alternative) is exceedingly complex (Kaufman et. al., 1975). Second, clearly agreed-upon definitions are not available for either approach, though mainstreaming seems to have attracted more attention. Third, although mainstreaming

was the hue and cry of the early 1970s, recent data suggest that the impetus was not empirically based (MacMillan & Becker, 1977) and that severe disservices could now be perpetuated through erroneous guidelines. Fourth, evaluative criteria of success are not known. Finally, despite the fact that the term "mainstreaming" is not used in legislation (the term used is "least restrictive alternative"), more discussion has arisen from the former than from the latter term.

In sum, although some themes may be identified, the current widespread acceptance of the least restrictive alternative may not promote a single course of action. Speculation would suggest that it does not. Furthermore, many of the themes that shaped what we know of the concept can and are being challenged on a number of theoretical premises. At the very least, it is plausible to suggest that the field of special education now has a mandate that is ill defined and unknown in its impact upon the educational outcomes of special students.

<sup>1</sup>Cf., Hallahan and Kauffman's (1978) description of the least restrictive alternative — "the child should be segregated from his normal classmates and separated from his home, family and community as little as possible" (p. 7) and Kaufman, Gottlieb, Agard, and Kukic's (1975) description of mainstreaming as "the temporal, instructional, and social integration of eligible exceptional children with normal peers based on an ongoing, individually determined, educational planning and programming process and requires clarification of responsibility among regular and special education administration, instructional and supportive personnel" (p. 4).

## ***AN EVALUATION OF THE LEAST RESTRICTIVE ALTERNATIVE IN PRACTICE: PROBLEMS OF IMPLEMENTATION***

As we have mentioned, part of the problem in implementing the least restrictive alternative concerns the confusion between what Schworm has termed "models" and "modes" of instruction. Schworm (1976, p. 178) has indicated that a model of instruction "implies a method for delivering instructional services," while a mode of instruction "implies the method, techniques, tactics and strategies" that ultimately effect changes in behavior. Models and modes must interact, but they are not synonymous. Schworm suggests that the current models of least restrictive environment are not yet complete. The models serve more to identify administrative arrangements within which modes can develop than to determine modes of instruction. Fully developed models should make allowance for the mode of instruction within the administrative arrangement.

For the individual student, the mode of instruction is more influen-

tial than the model in determining learning outcomes. Determining instruction primarily on the model basis addresses the location of instruction and intuitively seems to rate education higher if it is closer to more normative educational settings (regular class placement). However, such practices may not effectively address the severity of an individual student's needs on several dimensions, and it may circumvent the components necessary to meet that need. Schworm concludes that to "provide the least restriction, (special education) must develop instructional models that consider the student's learning needs within . . . the curriculum. It has administrative hierarchies, but it also needs a hierarchy for instructional services." (p. 181)

Thus, implementing a least restrictive environment for an individual learner must be based primarily on meeting that student's identified needs. In order to accomplish this, a satisfactory multidimensional perspective must be developed that will effectively establish a particular student's most important needs and, thus, the basis for developing educational environments.

A useful approach might be to use the mode of instruction as a criterion for determining the restrictiveness of educational practices. This may be difficult because the activities that affect an individual student are primarily determined from the standpoint of the school norm and professional judgment. Many times, there is a failure to consider the needs of the student across the various complex social-ecological environments of the student beyond the academic setting. Because of this, the individual goals that are set may not be appropriate beyond the confines of the school. The importance of the human ecological perspective detailing the interrelationships of persons and their behavior, places, times, and objects has been successfully presented by Barker (1968); Ittleson, Proshansky, Rivlin & Winkel (1974); Lewin (1951); and Moos (1974); and has been applied to the problem of education by Apter (1977); Bronfenbrenner (1976); Rhodes (1967); and Swap (1974).

Bronfenbrenner defines the "experimental ecology of education" as having two components: "relationships between characteristics of learners and the surroundings in which they live . . . (and) the relationships and interconnections that exist between these environments" (p. 5). He describes four ecological systems that may have special relevance to an individual learner.

1. The *micro system* is the immediate setting that contains the learner. A "setting," in this case, means a collection of immediate time, place, activity, and role structure. This system has been the most intensively studied in the educational literature. In the typical case, it might be a classroom.

2. The *meso system* includes the interrelations among the major

micro settings that can contain the individual at any point in time. Typical meso system interactions might be between home and school, home-organized special activities, and so on. Basically, the meso system is the collection of the various micro systems.

3. The *exo system* extends the meso system into the major social structures of society. These structures include major social institutions such as school and church as they operate at a community level. The *exo system* has considerable influence on and even determination of, the events that occur at the micro and meso system level.

4. Finally, the *macro system* consists of the "overarching institutions of the culture or subculture" (p. 6). These are, for example, the social, educational, legal, and political systems evolved and in operation at any time period. They are the premises that provide an umbrella for the smaller systems and establish a social-cultural congruence to a set of people. What is of critical importance is that these systems relate the behavior of an individual student to a series of ever-broadening contexts, physically and temporally beyond his or her physical self. Thus, a behavioral sequence is in large part not personological (Barker, 1968; Hobbs, 1966; Laing, 1967; Miscel, 1968; Rhodes, 1967) but instead directly rooted to a particular ecological context. It is implicit in this view that the interactive relationships across these systems are as important to an individual as relationships within any system.

The importance of multiple systems' influence on educational practice has been aptly summarized by Heiny (1976) in his illustration of the immense influence of home and community in the performance of high-risk children. Heiny notes: "In short family orientation was more powerful than the strongest forms of experimental schooling" (p. 419). The strongest treatment in an educational micro system was relatively powerless unless it recognized and made allowance for the influence of the meso and other higher-level systems. Thus, it is evident that the influence of human ecology ranges far beyond the immediate environmental and temporal conditions. Typically, the regular classroom — the micro system — has been the educational standard of judgment for the least restrictive alternative, as defined in the administrative models of instruction of Deno (1970); Lowenbraun and Affleck (1978); Jones (1976); and Reynolds (1962).

Thus from a human ecological perspective, there are at least two reasons why normative models cannot provide an adequate operational definition of restriction. First, a single normative micro system model cannot adequately represent the larger system of all students, because family-school, school-community, and other higher-level system interactions are almost certainly different for each child and vastly influential. As a result, the normal concept of restriction is a case of simply applying

micro system norms for general placement purposes. This is similar to using a single test score to determine eligibility for alternative programs, only in this case, it is the programs, not the tests, that have a singular norm base. Second, the current least restrictive model does not really focus on modes of instruction — that is, the specific activities and procedures for meeting the accepted needs of an individual regardless of the label for the specific setting. In short, there has been a failure to determine educational needs relevant to the student's total ecology and a failure to base the concept of restriction on the conditions most influential for meeting those needs. Adequate allowances have not been made for individual backgrounds, and educational restriction has been determined far more by the label of administrative arrangement than by the appropriateness of the instructional mode. There has been a total lack of and disregard for optimizing the match between the learning characteristics of students and the nature of the educational environment in which the student is placed, which is the true purpose of the least restrictive environment.

Considering the muddle regarding the true meaning of the concept of the least restrictive alternative for both regular and special education, what has transpired in the public schools? Jones (1976) reports that the majority of public school mainstreaming programs that he has reviewed are variations on four administrative models of instruction. These include the learning disability group model, the combination class model, the resource room model, and the partial integration model. These models are distinguished primarily in terms of the temporal integration and educational planning aspects of the definition of mainstreaming as used by Kaufman, Gottlieb, Agard, and Kukic (1975). The student in the learning disability group model is usually a member of the regular classroom who is also provided additional assistance in the regular classroom. Students in the combination class model are placed in regular small-group classrooms, and special materials are made available to them. In the resource room model, the student leaves the regular classroom for special instruction for certain periods each day. The student involved in the partial integration model spends part of the school day in both regular and special classrooms.

Lowenbraun and Affleck (1978) in an expansion of Deno's (1970) administrative model of instruction for handicapped students in the public schools, strongly argue that the following placement options be made available in all school districts: special class placement, in which the student is primarily assigned to a self-contained classroom but is integrated with normal peers for some part of the school day in academic or nonacademic subject areas or only in such activities as lunch, recess, or gym; resource room placement, in which the student is primarily as-

signed to a regular classroom but receives nonacademic or academic support services outside the regular classroom each day as well; itinerant services placement, in which the student is primarily assigned to a regular classroom but also receives one-to-one or small-group instruction from support personnel such as a speech and hearing specialist, physical therapist, or psychologist; in-class service placement, which provides the student with adjunct services (aides, interpreters, tutors) within the classroom as part of the in-class support system; and service to teacher placement, in which the student is primarily assigned to a regular classroom, and the regular education teacher receives additional services, materials, and programming suggestions to facilitate the student's learning.

A number of problems face educators who are attempting to implement the principle of the least restrictive alternative. First, there may be cause to doubt that a series of least restrictive environments can, *a priori*, be described without reference to individuals who will inhabit them. What do such (model) environments convey other than divergence from the administrative norm? Must the norm be the single criterion? If not, could more than one placement be less restrictive, depending upon the individual student's multiple areas of need (social, academic, physical)? Which area is the most important? How can educators accurately determine this? The least restrictive environment has to be individually determined.

Second, can educators readily equate environments? In an absolute sense, the answer is certainly no (Barker, 1968; Moos, 1974). In a less theoretical sense, there are the various placement options outlined by Jones (1976) and Lowenbraun and Affleck (1978). Buildings, teacher characteristics, educational materials, remedial emphasis, professional support, and so on differ considerably for each individual placement option even in the same school system. As a result, even identical placement options in the same school system are not equated on the very variables essential for attaining educational success and the restrictiveness of an individual student's program. Indeed, the current movement toward less restrictive environments is primarily determined by the student's psychometrically derived characteristics, which may or may not reflect the multiple educational needs that derive from an individual student's complex social-ecological environments.

## ***SUMMARY AND SUGGESTIONS FOR DEVELOPING THE LEAST RESTRICTIVE ENVIRONMENT***

Educators concerned with handicapped students most certainly have to define the acceptable standard for success in least restrictive settings.

Will it be temporal integration without immediate argument? Will it be satisfactory maintenance in a normative setting? Or will it be necessary to specify behavioral goals and then match learning environments that will optimize the likelihood of achieving mutually (child, parent, professional) agreed-upon educational goals? Currently, there is a great deal of concern among educators about placement (model) as opposed to program (mode) variables. Some investigators (Gottlieb, Semmel & Veldman, 1978; Kaufman, Agard & Semmel, 1979; MacMillan & Becker, 1977; MacMillan, Jones & Meyers, 1976; Meyers, MacMillan & Yoshida, 1975) are busily attempting to determine how learner background, learner competence, classroom socioemotional climate, classroom instructional conditions, attitudes of classroom teachers and students, and program cost interact with different program options [see Jones, Gottlieb, Guskin & Yoshida (1978); MacMillan & Semmel (1977); and Semmel, Gottlieb & Robinson (1979) for the most seminal reviews]. However, any clearcut information researchers can provide will be a long time coming. Some interim measures can be offered that might bridge the gap between the theoretical notion of the least restrictive alternative and implementable practice.

First, educators should constantly consider restriction with respect to impact across the many (family, school, community) social-ecological systems that a student inhabits in order to determine what it is important to teach. (It is interesting to note that none of the researchers mentioned previously are intensively concerned with the interlocking ecological systems that have special relevance to individual learners.) Second, a critical analysis of a setting's suitability prior to placement seems to be in order, model label notwithstanding, so that the most important mode variables for each individual student can be determined. Third, intrasetting flexibility and adaptability to each student's unique characteristics is essential so that the classroom environment can be arranged to meet each student's developmental needs. Lastly, every effort should be made to foster the evaluation of mutually agreed-upon goal statements as a measure of restriction in order to determine how successful instruction has been.

Regular and special educators are on the verge of opening a new period of service delivery practice to handicapped students under the aegis of PL 94-142 and other federal mandates. The unique opportunities available to handicapped students may be severely curtailed if the confusion regarding PL-142 is not soon resolved and rational programming practices implemented in the near future. In the interim, we hope that the measures suggested here will be of use to both regular and special educators. It may be suggested that the evaluation of progress toward achieving educational goals as jointly defined by parents and educators



and individual learner outcomes may provide a more satisfactory measure of the least restrictive alternative than reliance on special administrative models of instruction.

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